

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHINA EXPORT AND CREDIT  
INSURANCE CORPORATION a/k/a  
SINOSURE, and HEFEI REACHEVER  
IMPORT AND EXPORT LTD.,

*Petitioners,*

- against -

API INTERNATIONAL GROUP, LLC,

*Respondent.*

ECF CASE

No. 7:23-cv-5549

**[PROPOSED] DEFAULT JUDGMENT**

This action having been commenced on June 28, 2023, by the filing of the petition to confirm an arbitration award (ECF 1), and copies of the summons and Petition having been served on respondent API International Group LLC on July 5, 2023 by service via the New York Secretary of State, and proof of service having been filed on July 10, 2023 (ECF 7) and the respondent having failed to answer or otherwise move with respect to the Petition, and the time for answering or otherwise moving with respect to the Petition having expired, and Certificate of Default having been issued by the Clerk of the Court (ECF 20), it is

ORDERED, ADJUDGED AND DECREED: That the petitioners China Export and Credit Insurance a/k/a Sinosure and Hefei Reachever Import and Export Ltd. have judgment against respondent API International Group LLC confirming the arbitration award, and granting judgment in the amount of \$473,855.28, as well as post-award interest at \_\_\_\_\_% per annum, as measured from January 8, 2023, thirty days after the due date for payment, such due date being set by the December 9, 2022 arbitration award rendered in petitioners' favor, amounting to

\_\_\_\_\_ (as determined by the Clerk of the Court), plus costs and disbursements  
of this action amounting to \_\_\_\_\_.

Dated: \_\_\_\_\_, 2024  
White Plains, New York

\_\_\_\_\_  
The Honorable Nelson Román  
United States District Judge